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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

COLLEGIUM FUND SERIES 32, a Nevada
limited-liability company,

Plaintiff,

v.

MARK DANIEL SNYDER, an individual;
WELLS FARGO BANK, N.A.; DOES I
THROUGH X; and ROE
CORPORATIONS 1 THROUGH 10,

Defendants.

WELLS FARGO BANK, N.A., a national
banking association,

Counter-Claimants,

v.

COLLEGIUM FUND SERIES 32, a Nevada
limited-liability company, ABSOLUTE
COLLECTION SERVICES, LLC, a Nevada
limited liability company; NUEVO VISTA
HOMEOWNERS ASSOCIATION, INC., a
Nevada non-profit cooperative corporation,

Counter-Defendants.

Case No.: 2:16-cv-01640-JCM-PAL

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
FEDERAL HOME LOAN
MORTGAGE CORPORATION'S
MOTION FOR SUMMARY
JUDGMENT**

(THIRD REQUEST)

1 FEDERAL HOME LOAN MORTGAGE
2 CORPORATION,

3 Counter-Claimants,

4 v.

5 COLLEGIUM FUND SERIES 32, a Nevada
6 limited-liability company, ABSOLUTE
7 COLLECTION SERVICES, LLC, a Nevada
8 limited liability company; NUEVO VISTA
HOMEOWNERS ASSOCIATION, INC., a
Nevada non-profit cooperative corporation,

Counter-Defendants.

9 Wells Fargo Bank, N.A. (“Wells Fargo”), Federal Home Loan Mortgage Corporation
10 (“Freddie Mac”), Collegium Fund LLC, Series 32 (“Collegium Fund”), Absolute Collection
11 Services, LLC (“ACS”), and Nuevo Vista Homeowners Association, Inc. (the “HOA”), by and
12 through their respective counsel, hereby respectfully request that the Court enter an order, pursuant
13 to Local Rules 6-1 and 7-1, extending the time for Collegium Fund, ACS, and the HOA to respond
14 to the Motion for Summary Judgment (the “MSJ”) filed by Freddie Mac on January 17, 2017 [ECF
15 No. 26] and joined by Wells Fargo on January 20, 2017 [ECF No. 29]. The response to the MSJ is
16 currently due on March 28, 2017. The Parties have agreed to extend this response date to April 18,
17 2017.

18 The extension is being sought in good faith and will not unduly delay this litigation. Freddie
19 Mac recently discovered additional documents that may be responsive to Collegium Fund’s
20 discovery requests. Collegium Fund, the HOA, and ACS would like time to review these additional
21 documents before responding to the MSJ. Freddie Mac has now reviewed the documents and
22 produced them by mail on March 23, 2017. The requested extension will give Collegium Fund, the
23 HOA, and ACS roughly three weeks from receiving the document until responding to the MSJ.

24 Accordingly, the Parties respectfully request that the Court grant this Stipulation and extend
25 the time to respond to the MSJ from March 28, 2017 to April 18, 2017.

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28 ///

1 DATED this 29th day of March, 2017.

2 CONNAGHAN|NEWBERRY

SNELL & WILMER L.L.P.

3 /s/Paul R. Connaghan (with permission)

/s/ Nathan G. Kanute

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12 /s/ Shane D. Cox (with permission)

/s/ Elizabeth B. Lowell (with permission)

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18 **IT IS SO ORDERED.**

19 
HON. JAMES C. MAHAN

UNITED STATES DISTRICT COURT JUDGE

20 DATED: March 30, 2017

Snell & Wilmer

LLP
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CERTIFICATE OF SERVICE

As an employee of Snell & Wilmer L.L.P., I certify that I served a copy of the foregoing
**STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO FEDERAL HOME
 LOAN MORTGAGE CORPORATION'S MOTION FOR SUMMARY JUDGMENT** on the
 29th day of March, 2017 by the method indicated:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada addressed as set forth below.
- ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by _____, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

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/s/ Lara J. Taylor
 An employee of Snell & Wilmer L.L.P.